

JACOB D. BUNDICK, ESQ.

Nevada Bar No. 9772

MICHAEL R. HOGUE, ESQ.

Nevada Bar No. 12400

GREENBERG TRAURIG, LLP

10845 Griffith Peak Drive, Ste. 600

Las Vegas, NV 89135

Tel: (702) 792-3773

Fax: (702) 792-9002

Email: bundickj@gtlaw.com

hoguem@gtlaw.com

Attorneys for Defendant Specialized

Loan Servicing, LLC d/b/a SLS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THOMAS R. LAYTON, an individual

Plaintiff,

v.

SPECIALIZED LOAN SERVICING, LLC, a
Delaware limited liability company d/b/a SLS,

Defendant.

Case No. 2:20-cv-01225-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
SPECIALIZED LOAN SERVICING, LLC
TO FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[SECOND REQUEST]

Defendant Specialized Loan Servicing LLC ("SLS") and Plaintiff Thomas R. Layton ("Plaintiff"), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. Plaintiff filed a putative Class Action Complaint ("Complaint") against SLS in the Eighth Judicial District Court for the State of Nevada in the above-captioned action on May 27, 2020.

2. Plaintiff served the Complaint on SLS on May 29, 2020.

3. On June 29, 2020, SLS removed the matter to this Court pursuant to the 28 U.S.C. § 1441 and 28 U.S.C. § 1332(d).

///

///

///

1 4. Pursuant to Fed. R. Civ. P. 81(c)(2), the deadline for SLS to respond to the Complaint
2 is July 6, 2020, which date was continued to July 31, 2020 by virtue of the Court's Order granting
3 Defendant's Motion to Extend Time to Answer or Otherwise Respond to Plaintiff's Complaint and Set
4 Briefing Schedule (First Request)(ECF No. 4).

5 5. Counsel for the parties now seek a sixty (60)-day extension to the deadline for SLS to
6 respond to the Complaint from July 31, 2020 to September 29, 2020 as the parties are discussing
7 potential resolution of the matter, in addition to Plaintiff's counsel having a family emergency that
8 requires her immediate attention.

9 6. Additionally, given that SLS presently anticipates filing a motion in response to
10 Plaintiff's Complaint, counsel conferred and stipulated to the following briefing schedule:

- 11 a. Deadline for SLS to respond to the Complaint: September 29, 2020;
12 b. Deadline for Plaintiff to file his opposition to any SLS motion: October 29, 2020;
13 and,
14 c. Deadline for SLS to file its reply to Plaintiff's opposition: November 19, 2020.

15 7. This request is made in good faith and not for the purpose of delay. Rather, the parties
16 believe that the requested continuance will further the interests of efficiency and judicial economy by
17 allowing the parties additional time for potential resolution of the matter and by affording Plaintiff's
18 counsel time to attend to her family emergency.

19 THEREFORE, and for good cause shown, the parties respectfully request that the deadline for
20 SLS to file a response to the Complaint be extended up to and including **September 29, 2020**.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

FURTHER, and for good cause shown, the briefing schedule for any motion filed by SLS in response to the Complaint shall be as follows:

- a. Deadline for SLS to respond to the Complaint: September 29, 2020;
- b. Deadline for Plaintiff to file his opposition to any SLS motion: October 29, 2020; and,
- c. Deadline for SLS to file its reply to Plaintiff's opposition: November 19, 2020.

IT IS SO STIPULATED

DATED this 22nd day of July, 2020.

DATED this 22nd day of July, 2020.

GREENBERG TRAURIG, LLP

CLARK NEWBERRY LAW FIRM

/s/ Jacob D. Bundick

Jacob D. Bundick, Esq. (NSB 9772)
Michael R. Hogue, Esq. (NSB 12400)
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135

/s/Tara Clark Newberry

Tara Clark Newberry, Esq. (NSB 10696)
810 S. Durango Drive, Suite 102
Las Vegas, Nevada 89145

Counsel for Specialized Loan Servicing LLC

Counsel for Thomas R. Layton

ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: July 22, 2020